

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRAIG CARTON and MICHAEL WRIGHT,

Defendants.

Case No. 17 Cr. 680 (CM)

ORAL ARGUMENT
REQUESTED

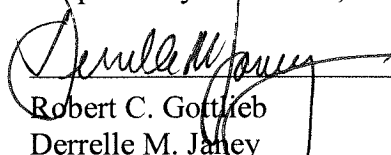
NOTICE OF MOTION

PLEASE TAKE NOTICE, that defendant CRAIG CARTON, by and through his undersigned attorneys, GOTTLIEB & JANEY, LLP, upon the annexed affirmation of Derelle M. Janey, attorney for the defendant, duly sworn to on the 18th day of May, 2018; all exhibits attached thereto; the accompanying Memorandum of Law; and the prior proceedings herein, hereby submits this Notice of Motion to Dismiss Count Three of the Indictment (Securities Fraud) for Failure to State an Offense, pursuant to Federal Rules of Criminal Procedure Rule 7(c) and Rule 12(b)(3)(B), as well as the Fifth Amendment of the United States Constitution.

Dated: New York, New York

May 18, 2018

Respectfully submitted,


Robert C. Gottlieb
Derelle M. Janey
Seth J. Zuckerman

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